

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.
BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,
Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,
v.
ROBERT D. REDSTON 1998 TRUST; DAVID
ISELIN, individually and in his capacity as Trustee
for the Robert D. Redston 1998 Trust; AUDREY
ISELIN; and TERESA COHEN,

Defendants.

Adv. Pro. No. 10-04738 (SMB)

NOTICE OF EXTENDED RESPONSE DUE DATE

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 8762]. Pursuant to the Notice of Applicability filed by Plaintiff, Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Services LLC (“BLMIS”) under the

Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et. seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), in this Adversary Proceeding on December 6, 2010 [Dkt. No. 2], the Order and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter.

Pursuant to the Avoidance Procedures, § 2(E), the Trustee is required to file a “Notice of Extended Response Due Date” upon the termination of mediation setting forth the new response due date. In accordance therewith, the new response due date shall be thirty (30) days following the date of completion of the failed mediation.

The mediation of the Adversary Proceeding took place at the offices of Thompson & Knight LLP in New York, New York on January 16, 2015. The mediation was unsuccessful and the deadline to conclude mediation concludes on March 31, 2015. In accordance with the Order, the Extended Response Due Date for Defendants to respond to the Complaint is Friday May 1, 2015.

Dated: March 31, 2015
New York, New York

Respectfully submitted,

Of Counsel:

BAKER & HOSTETLER LLP
811 Main Street, Suite 1100
Houston, Texas 77002-5018
Telephone: 713.751.1600
Facsimile: 713.751.1717
Dean D. Hunt
Email: dhunt@bakerlaw.com

By: /s/ Nicholas J. Cremona
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111-0100
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*